Meeting Notes: Community Advisory Group - Aerojet Superfund Issues, November 15, 2005

1. Attendees

Charles Berrey (USEPA, Aerojet RPM), Alex MacDonald (Regional Water Quality Control Board), Jackie Lane (EPA), Michael Girard (Aerojet), Tricia Carter (Recorder, CH2M HILL), Paul Schubert (GSWC), Janis Heple, Vicki Lee, Mike Cataldo (Schnitzer Steel), Paul Harris (GSWC), Jean Young (SCWA), Ken Payne (City of Folsom), Tim Murphy (Gen Corp), Frank McCarthy

2. Approval of Meeting Minutes

This agenda item was delayed until the end of the meeting. The minutes were accepted as final minor correction from Paul Schubert.

3. Update on major milestones and deliverables produced since the May meeting for OU3 and other environmental related efforts at Aerojet.

Charles updated the CAG on recent OU-3 activities/deliverables. Since the last meeting, the following has been completed:

- 1. Agencies approved as modified the 2005-6 General Monitoring Plan.
- 2. Agencies approved as modified the schedule extensions for Prefinal/Final Design Submissions (Area 3 to May 9, 2006 and Area 4 to May 26, 2006).
- 3. Agencies granted Aerojet a 120 day extension for submission of both the Short-term and Long-term Replacement Contingency Plans.
- 4. Agencies require revision in 21 days to the Work Plan for Ultraviolet Destruction of N-Nitrosodimetylamine at Low Concentrations Area 2. Issue destruction below 2 ppt to 1.3 ppt.

Charles summarized other Aerojet Environmental Efforts:

- 5. EPA commented on Aerojet's Field Sampling Plan Audits of 2000 and 2004 and requests Aerojet perform annual FSP audits per Quality Assurance Program Plan. EPA Richmond Lab attended FSP audit in October. Aerojet is to perform volatile organic sampling training by 11/27/05.
 - Janis asked why the training was necessary. Mike explained that there is a difference in Aerojet's and the contractor's sample collection methods; however, this does not affect the data.
- 6. The Perimeter Operable Unit (OU5) Feasibility Study alternatives were presented to EPA's National Remedy Review Board (NRRB). The NRRB presented comments to the region to which the region is responding. Once the NRRB accepts the region's comments the NRRB comment letter will be part of the public record.
- 7. Agencies responded to Aerojet' 8/31/05 meeting request on how landfill deletion can be accomplished by 01/01/2010 and Aerojet's request that approximately 95 acres removed be added back to OU5. Agencies requested portions of Groundwater Extraction and Treatment modifications be performed under the Partial Consent Decree. Aerojet's formal response is pending.
 - The 95 acres was originally removed because it would delay the Proposed Plan/Record of Decision. The delay will be mitigated by utilizing the existing agreement. The NRRB will have to review this project because the cost to remediate is over \$25M. Charles noted that the significant issue here is the fact that OU5 includes three sides of Aerojet.

- Utilizing the Partial Consent Decree will allow some of the work to be conducted prior to the ROD.
- 8. Agencies commented on response to comments on Aerojet's Work Plan to Determine Background Metals in Surface Soils at the Aerojet Superfund Site.
- 9. Agencies commented on response to comments on Aerojet's Field Sampling Plan for Validation of the Johnson and Ettinger Model to be included in the work plan.
- 10. Agencies provided additional comment on Aerojet's Remedial Investigation/Feasibility Study Work Plan for Source Area Operable Units.
- 11. Agencies commented on Aerojet's Preliminary Response to Agency Comments, February 2005 Final Perimeter Groundwater Operable Unit Remedial Investigation/Feasibility Study for incorporation in 60 days.
- 12. EPA provided comments on 40 Laboratory Analytical Methods. 14 approved as submitted, 16 revise in 60 days and 10 update as part of next annual submission.
- 13. Agencies provided additional comments on Aerojet's Island Operable Units Treatability Work Plan.

4. Update on Short and Long-Term Water Replacement Contingency Plans; Charles Berrey

Charles noted that the Agencies granted a 120 day extension to 2/28/06 for the SWRCP and LWRCP based on Aerojet's status letter of 10/05/2005 now due 2/28/06 and California American Water Company's (CalAm's) letter of 10/19/05 which did not oppose the extension. The Agencies letter of 10/31/05 requested that:

- By 11/30/05, Aerojet and Agencies meeting with potential SWRCP suppliers to resolve 974 gpm shortfall.
- By 11/14, Aerojet submit technical memo evaluation the need for LWRCP replacement for Chettemham well.

Charles explained that for total plume control, the EPA wanted wellhead treatment on the Chettemham well (Area 1) which was triggered in July of last year. The well showed no detections of contamination for 14 months. Aerojet asked the EPA to reconsider the requirement for wellhead treatment because the upgradient well was controlling the plume (low concentration, now at trace concentration). EPA and the Agencies requested that Aerojet show a plan to get the wellhead treatment in place in the interim.

Vickie asked if this is the long term supply. Both the SWRCP and the LWRCP require contingency planning for 2,989 gpm to cover five CalAm water supply wells of which only the Chettenham well has triggered. Currently, Aerojet has provision for 2,015 gpm in its SWRCP (1,015 gpm from the County and 1,000 gpm from Golden State) none of which can be used for permanent replacement water. Aerojet does not have a permanent replacement water supply for its LWRCP. The Agencies still require 2,989 gpm of contingency water for both the SWRCP and LWRCP planning until multiple paths of evidence show the upgradient Area 1 remedy, now in place, is fully effective. However, unless the Chettenham well retriggers when returned to operation, the Agencies will not require the Chettenham well be replaced.

Private Wells – [SWRCP volume TBD] After a record search and field review of private wells in OU3, there are 9 private wells in the water replacement and monitoring plans of which two are not in use and only used for groundwater monitoring, six that are used only for irrigation and one that the water use is not yet known. After all well logs were reviewed to determine where private wells are located and if they are in operation, it was also determined what contingency water might be needed

if these wells were impacted. Charles provided a handout listing nine wells and their use/status. These wells need to be included in the private well portion of the contingency plan. A list of existing purveyor wells was also included in the handout.

5. Update on Well Installation Activities in OU-3 and Beyond.

Alex provided an update in each area and zone.

Zone 1: There are no new items/actions occurring in Zone 1. Aerojet will be accelerating their cleanup under the partial consent decree. Extraction wells are anticipated for this area to address contamination in the Fair Oaks area.

Areas 2/3/4: Aerojet put in extraction wells at Ancil Hoffman Park. An aquifer test was conducted to determine the volume of water necessary to design the treatment plant.

Zone 2: The IRCTS Feasibility Study proposing pump and treat as a remedial technology was approved by the Water Board (conceptually agreed upon). Aerojet's remedy for the IRCTS has cut off a portion of the plume to allow for pump and treat to be an effective remedy.

Zone 3: Aerojet is working on completing the installation of extraction wells to address the plume from White Rock Road Dump. There will be 5 new monitoring wells in the southern part of Zone 3.

A treatability study (iron wall) will be conducted in the Island OU to address high concentrations of TCE in shallow groundwater. The OU 6 investigation is almost complete.

6. Inactive Rancho Cordova Test Site - Remedial Action Plan

Janis distributed the presentation made during the public comment period meeting for the IRCTS. The comment period closed on November 14th. Contamination is moving south under Sunrise Douglas. The concern is to address this contamination prior to development in the area. Alex noted that there has been some difficulty having people agree with monitoring well locations. Two thirds of the monitoring wells had to be destroyed and reconstructed. The idea was to put pipelines in the utility trenches and to construct one treatment plant instead of two.

Jean asked if institutional controls will be the final remedy for soil contamination for the Kappa-Gamma study. Jean also noted that the Alpha and Beta sites did not need soil cleanup. Jean noted DTSC claims these are presumptive remedies for VOCs and that VOCs should be taken out of the groundwater and soil. The County suggests a dual phase extraction system. Alex noted that perchlorate is coming form the Alpha site and that the Kappa-Gamma area is not a source for perchlorate. The data is not showing a risk to groundwater (not enough mass). A modeling effort has been conducted to show there would not be an impact. The two models assessed health risk and impact to groundwater. The models showed that the level of contamination is a small risk and that it does not justify going after a small amount of TCE in the soil at depth (it is not economically or technically feasible).

7. Miscellaneous.

Mike Girard mentioned that he contacted the Sacramento Bee to ensure communication between the neighborhood sections so that notices can be placed in areas north of the American River.

Jackie Lane also distributed a pamphlet created upon the CAG's request regarding the Aerojet Superfund Site summarizing site history/background, cleanup to date, and environmental progress, as well as a comprehensive map depicting the operable units and their corresponding composite plumes. The pamphlet provided should have been marked draft and will be revised.

8. Next Meeting.

Next meeting: Tuesday, January 17, 2006, Sheriff's substation, Community Room, 10361 Rockingham Way (just off Mather), Rancho Cordova, 7 p.m. to 9 p.m.